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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001
Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0428
Comment submitted by Steven J. Thomas, Fulton County Planning Commission, County of Fulton, Pennsylvania

Submitter Information

Submitter's Representative: Steven J. Thomas
Organization: Fulton County Planning Commission
Government Agency Type: Local
Government Agency: County of Fulton, Pennsylvania

General Comment

The Fulton County Planning Commission strongly objects to the EPA's proposed TMDL for the Chesapeake Bay. Passing of the new regulations would cause significant economic hardship of the municipal authorities and residents linked to those systems. The proposed TMDL regulations are absolutely not economically feasible at this time in Fulton County. According to the Bureau of Labor and Statistics (Sept. 2010), Fulton County's unemployment rate is 13.7%. This is 2nd highest rate in Pennsylvania. Additionally, our largest plant, in McConnellsburg Borough, has already invested thousands of dollars into an upgrade project to meet the current requirements of 6 mg/I TN and 0.8 mg/I TP. Requiring them to meet more stringent loads would cause extreme hardship on the end-users, the residents.

While the intent of the regulations is commendable, the Fulton County Planning Commission can not support the proposed TMDL because of the severe economic impact that would be placed on our local communities.